

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

ROYAL INTERCO, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10674 (TMH)

Joint Administration Requested

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that, pursuant to sections 342 and 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), and Rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the undersigned counsel hereby enter their appearance as counsel for Sofidel America Corp. (“Sofidel”) and request that all notices given or required to be given in connection with these chapter 11 cases, and all papers served or required to be served in these chapter 11 cases and in any cases consolidated or administered herewith, be given to and served upon the following:

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¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal EIN, are as follows: Royal Interco, LLC (7913); Doubletree Paper Mills, L.L.C. (1830); Royal Paper, LLC (9937); and Sun Paper Company, LLC (7899). The Debtors’ mailing address is 711 North 17th Avenue, Phoenix, AZ 85007.

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers referred to above, but also includes any notice, motion, proposed order, application, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, disclosure statement and plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically or otherwise, that is filed or given in connection with these cases and the proceedings therein.

PLEASE TAKE FURTHER NOTICE that this *Notice of Appearance and Request for Service of Notices and Papers* (this “Notice”) and any prior or subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the rights of Sofidel, including, without limitation: (1) the right to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) the right to have final orders in any non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a *de novo* review by the United States District Court for the District of Delaware (the “District Court”); (3) to trial by jury in any case, proceeding, matter, or controversy so triable; (4) to have the reference withdrawn by the District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which Sofidel is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. For the avoidance of doubt, filing this Notice is not intended as, and shall not be, consent by Sofidel to the entry of final

orders and judgments in any case, proceeding, matter, or controversy if it is determined that the Court, absent consent of Sofidel, cannot enter final orders or judgments in any such case, proceeding, matter, or controversy, as applicable, consistent with Article III of the United States Constitution.

PLEASE TAKE FURTHER NOTICE that the aforementioned attorneys request that they be added to the official service list for notice of all contested matters, adversary proceedings, and other proceedings in these chapter 11 cases.

[Signature page follows]

Dated: April 9, 2025

Respectfully submitted,

/s/ Sean T. Greecher

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